



July 12, 2022

Hon. John P. Cronan, U.S.D.J.
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

By Electronic Filing.

Re: Curran-Groome v. City of New York, 22-cv-00710

Dear Judge Cronan:

I am co-counsel for Plaintiff in the above-captioned matter. I write to request the Court's permission to file a letter under seal that discusses settlement issues that are not necessarily appropriate for the public docket. Per the Court's Individual Rules, I have consulted with Defendants' counsel, who stated they agreed the letter was inappropriate for public filing.

The letter at issue is a request to be relieved of the obligation to attend 1983 Plan Mediation, because Defendants have confirmed they are in a no pay position. The contents of the letter contain discussions of settlement positions that are not of interest to the public — but would prejudice both Plaintiff and the City should they become public. While there is a presumption of public access, as set out in *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110 (2d Cir. 2006), that presumption is weaker when — as opposed to summary judgment on a case of some public interest — the documents concern merely the parties' attendance at a mediation session. We believe, on evaluation of the motion's contents, the Court will see why we believe those contents do not implicate the public's interest in the resolution of cases — but do implicate the parties' and the Court's mutual interest in frank settlement discussions.

Thank you for your attention to this matter.

Respectfully submitted,

/s/

J. Remy Green
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cc:

All relevant parties by ECF.